

Distance Learning Committee (DLC)

Report to Academic Senate

December 1, 2022

Guidance on Regular Substantive Interaction (RSI) in recent Dept of Education Letter

Regulations on RSI changed in 2020, but questions of interpretation remained. A digital advocacy group, WCET, sent the Department of Education (DOE) questions from many of its constituents. An answering letter from the DOE arrived last October. Here is pertinent information from this letter. Some of this information is a refinement on communications that the Distance Learning Committee (DLC) issued. Please review and note changes as you prepare your online courses for next semester. Since Mt. SAC's accreditation visit will focus on courses offered during this winter and spring, we want to make sure that RSI is in good shape.

Further Guidance on RSI

Highlights of the DOE letter include the following.

- This letter clarified that “direct instruction” was not accomplished asynchronously. The term “direct instruction” means live, synchronous instruction where both the instructor and the student are online and in communication at the same time.
 - While it is a great idea to include materials that you, the instructor, have created or curated, it does not count as RSI if it is accessed by the student asynchronously. This is a change from previous DLC recommendations since we had interpreted the regulations differently.
- RSI may include instructors who make themselves available at a specific scheduled time and through a specific modality (e.g., an online chat or videoconference) for students to interact about the course material, regardless of whether the students choose to make use of this opportunity or interact with the instructor at the scheduled time.
 - You can publish study session or Zoom links in your course to indicate that you are available to provide information or respond to questions at a "predictable and scheduled" time. Consider adding a "communications page" to your orientation or syllabus to describe all the ways you are available to students.
- Auto-graded responses to quiz questions are not considered RSI, even if the professor wrote the questions and responses.
 - The DOE sees this option as interacting with a computer, not an instructor. You must individually evaluate the student's work and provide specific feedback to the student in order for grading to be considered RSI.
- The DOE declined to define the level of activity that would indicate "discussion facilitation," declaring that such determination must be made on a case-by-case basis.

- Note, if you offer comments as part of a grade after the discussion closes, that would be considered feedback, not facilitation.
- The DOE explained that a letter from an accrediting agency would be sufficient to indicate approval of "other instructional activities" as stated in item 5 of the list, below. If an accrediting agency is unwilling to provide specific documentation, the "approved practices" would only be those that the accrediting agency had included in its general published policies.

➔ As a reminder, here is the original regulatory wording about RSI (from 34 CFR 600.2).

An institution ensures regular interaction between a student and an instructor or instructors by, prior to the student's completion of a course or competency:

1. *Providing the opportunity for substantive interactions with the student on a predictable and scheduled basis commensurate with the length of time and the amount of content in the course or competency; and*
2. *Monitoring the student's academic engagement and success and ensuring that an instructor is responsible for promptly and proactively engaging in substantive interaction with the student when needed, on the basis of such monitoring, or upon request by the student.*

Substantive interaction means engaging students in teaching, learning, and assessment, consistent with the content under discussion. Professor-student interaction employs a variety of contact methods on a predictable and scheduled basis and includes at least two of the following.

1. *Providing direct instruction;*
2. *Assessing or providing feedback on a student's coursework;*
3. *Providing information or responding to questions about the content of a course or competency;*
4. *Facilitating a group discussion regarding the content of a course or competency; or,*
5. *Other instructional activities approved by the institution's or program's accrediting agency.*

Please contact Carol Impara at cimpara@mtsac.edu if you have questions.

SPOT Update

- There are now 838 SPOT-certified faculty.
- 29 faculty have SPOT recertification due July 31, 2023. Not sure if you are one of them? Check the SPOT Recertification webpage.

Distance Learning Amendment Forms Process

When do you need to submit a DL Amendment Form?

- If your course is going through 5-year review and you have not updated the DL Amendment Form in more than 2 years
- If your course has a modification in course identifier, title, units, lecture or lab topics
- If your course was previously FOMA and you want to offer it online regularly
- If you want to start offering a course online for the first time

For any of these reasons, you need to submit a DL Amendment Form for review! *Be sure to discuss distance learning at your department meeting and record approval in the minutes.*

Here are the steps!! (Thanks to Dr. Mica who wrote them out to me.)

1. Faculty complete their DL Forms and submit them via the online submission process.
 - Find out more about DL Amendment Forms [from the DL Amendment Form webpage](#). The most recent version says “2021 with FOMA.”
2. The Distance Learning Faculty Coordinator prechecks the forms and contacts faculty with questions, then adds the form to the Distance Learning Committee agenda.
 - DLC meets the second and fourth Tuesdays during Fall and Spring. Forms must be received at least one week prior to the meeting. Form volume will determine when the DLC reviews forms.
 - The DL Coordinator does not have the authority to solely approve DL forms! If you realize in January that you have no form ready for Spring, then submit the form ASAP and consider a late start 8-week course offering.
3. The Distance Learning Committee reviews the forms. If DLC approves the forms, the DL Coordinator forwards them to the Curriculum Liaison.
4. The Curriculum Liaison adds the DL Form review to the Education Design Committee Agenda.
5. The EDC reviews the DL Request from Dept. X. If approved by EDC, the approval is reflected in the EDC minutes, which are put on the Curriculum & Instruction Team Agenda.
6. At C&I, EDC minutes get reviewed. Once EDC minutes are approved, the DL approval process is complete.
7. The Distance Learning Faculty Coordinator reviews approved EDC minutes and uploads the completed forms to [Alphabetical List of Distance Learning Amendment Forms](#).

Please allow time to see Forms through this process. DLC recommends submitting forms at the start of the semester. Don't wait until the semester is half over to submit a form!

Your 5-year review may be held in waiting for an updated DL Amendment Form. Please contact Curriculum if you have any questions about your COR review.

Quality Review/ Alignment to CVC Rubric Still Ongoing!

Mt SAC's local Peer Online Course Review (POCR) team is still encouraging faculty to align their fully online courses to the CVC Course Design Rubric and earn a Quality Review badge. We particularly invite transfer-level English, Math, Counseling, and Library faculty to join us. Please contact Carol Impara – cimpara@mtsac.edu for more information.

Respectfully submitted,
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